## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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UNITED STATES OF AMERICA

v. No. 3:23-CR-247-B

**HOLLY ANN ELKINS** 

## **JOINT PRE-ADMITTED EXHIBIT LIST**

The United States and the defendant, Holly Ann Elkins, agree that the following trial exhibits are pre-admitted<sup>1</sup>:

GX	EXHIBIT DESCRIPTION
1	Google Maps of Greentree Apartments
5	Video of lobby of Greentree Apartments
7	Surveillance Video of Ikeler
10	Photo of seized Ford Expedition (for eyewitnesses)
12	Photo of Greentree Apartments
13	Photo of Greentree Apartments with Burkett's car
14	Photo of Greentree Apartments with Burkett's car
15	Photo (close up) of blasted car window
16	Photo of Burkett's car with knife sheath and blood with evidence numbers
17	Photo of Burkett's car with blood in front
18	Photo of Burkett's car with license plate
19	Photo (close up) of blood on pavement
20	Photo of Burkett's license plate on front of her car

<sup>&</sup>lt;sup>1</sup> The parties also agree that, pursuant to Federal Rule of Evidence 901, there are no objections to the authenticity of the proposed evidence in this case.

22	Photo of knife sheath
23	Photo (close up) of knife sheath
24	Photo (close up) of knife sheath
27	Photo of interior of Burkett's car—back passenger's side
28	Photo of interior of Burkett's car—driver's side
29	Photo of inside of car dashboard with dark hair and shotgun pellet damage
30	Photo of top of dashboard with broken glass and hair
31	Photo of Burkett's phone in the car
37	Physical Evidence: Birdshot pellets from passenger's side [SWIFS #34] (Campbell)
38	Physical Evidence: Birdshot pellets from passenger's side [SWIFS #35] (Chevalier)
40	Photo of blood on sidewalk
41	Photo of blood on sidewalk
42	Photo of blood on window frame
43	Photo of blood on window
44	Photo of blood on pavement near office
45	Photo of blood near plant
46	Photo of Burkett's body
53	Medical Examiner Report (Cooper)
73	Photo of birdshot recovered from Burkett's scalp
74	Photo of Burkett's autopsy—X-ray of Burkett's body
76	Physical Evidence: Burkett's blood card from autopsy (Cooper)
78	Photo of Burkett in life
79	Photo of Burkett in life and W.B. (black shirts)
80	Photo of Alyssa Burkett in life and W.B.
84	Google Maps of Flamingo Stop of Elkins & Beard
96	Excerpt from Elkins's phone – Walgreens shopping list
114	Excerpt from Beard's Hilti work phone extraction report – Relevant internet searches

117	Photo of GPS tracker attached to undercarriage of Burkett's car
118	Photo (close up) of GPS tracker attached to undercarriage of Burkett's car
119	Photo of GPS tracker removed from Burkett's car
120	Photo of GPS tracker removed from Burkett's car
121	Photo of GPS tracker removed from Burkett's car
122	Photo of sticker inside of GPS tracker box removed from Burkett's car
123	Physical Evidence: GPS tracker removed from Burkett's car (Burnham/Fisher)
127	Physical Evidence: GPS tracker removed from Erwin's truck (B. Erwin/C. Erwin/Pool)
129	Photo of front of 5604 Flamingo Dr.
130	Photo of entryway of 5604 Flamingo Dr.
131	Photo of living room of 5604 Flamingo Dr.
132	Photo of office of 5604 Flamingo Dr.
133	Photo of master bedroom of 5604 Flamingo Dr.
134	Photo of nightstand of master bedroom of 5604 Flamingo Dr.
135	Photo of nightstand of master bedroom of 5604 Flamingo Dr.
136	Photo of master closet of 5604 Flamingo Dr.
137	Photo of formal dining room of 5604 Flamingo Dr.
138	Photo of dining room looking into kitchen 5604 Flamingo Dr.
139	Photo of dining room looking into kitchen 5604 Flamingo Dr.
140	Photo of kitchen 5604 Flamingo Dr.
141	Photo of door to garage 5604 Flamingo Dr.
142	Photo of overview of garage 5604 Flamingo Dr.
143	Photo of media room 5604 Flamingo Dr., shows safe
144	Photo of media room 5604 Flamingo Dr.—shows safe
145	Photo of open safe in media room 5604 Flamingo Dr.
146	Photo of open safe in media room 5604 Flamingo Dr.—shows guns
147	Photo of open safe in media room 5604 Flamingo Dr.—shows guns

148	Photo of open safe in media room 5604 Flamingo Dr.—shows guns
149	Photo of guest room 5604 Flamingo Dr.
150	Photo of guest room 5604 Flamingo Dr.—shows Prime Tracking box
151	Photo of guest room (Willow's room) 5604 Flamingo Dr.
152	Photo of guest room (Willow's room) 5604 Flamingo Dr.
153	Photo of guest room (Willow's room) 5604 Flamingo Dr.
154	Photo of handwritten Beard letter to Elkins (3 pages)
155	Photo of tracking device case and two chargers found in kitchen drawer (Room 4) 5604 Flamingo Dr.
156	Photo of tracking device case and two chargers (Room 4) 5604 Flamingo Dr.
157	Photo of two Bic lighters on counter 5604 Flamingo Dr.
158	Photo of tracking device located in office (Room 6) 5604 Flamingo Dr.
160	Photo of "Willow to Do" - "Put Tracker on Ben's Truck" at 5604 Flamingo Dr.
163	Photo of note from Hilti notebook regarding 2007 Nissan Quest & J.A.R. found at 5604 Flamingo Dr.
165	Photo of Spy Spot box containing Spy Spot battery (Room 8) found at 5604 Flamingo Dr.
166	Photo of Spy Spot wall charger (Room 8) found at 5604 Flamingo Dr.
167	Photo of Spy Spot box for wall plug extended battery (Room 11) found at 5604 Flamingo Dr.
169	Photo of SinoTrack GPS tracker box found in guest room (Room 11) at 5604 Flamingo Dr.
170	Close up photo of SinoTrack GPS tracker box found in guest room (Room 11) at 5604 Flamingo Dr.
171	Photo of Prime Tracking box found in guest room (Room 11) at 5604 Flamingo Dr.
172	Side photo of Prime Tracking box with IMEI 015181001558031 found at 5604 Flamingo Dr. (matches GPS tracker found on Burkett's car)
173	Photo of inside of Prime Tracking box found at 5604 Flamingo Dr.
174	Physical Evidence: Prime Tracking box with IMEI 015181001558031 found at 5604 Flamingo Dr. (Fisher)
176	Photo of black tracker box found in garage (Room 5) at 5604 Flamingo Dr.

	Photo of Diamonds Direct envelope addressed to Beard found in living room
178	(Room 7) at 5604 Flamingo Dr.
179	Photo of opposite side of Diamonds Direct envelope (with false drug tip information)
180	Photo of opposite side of envelope (close up)
181	Physical Evidence: Diamonds Direct envelope (with false drug tip information) found at 5604 Flamingo Dr. (Bonner)
183	Photo of Hilti HP laptop from dining room (Room 3) at 5604 Flamingo Dr.
184	Physical evidence: Hilti HP laptop (Harding)
187	Excerpt from Hilti HP laptop extraction report – Relevant internet searches
189	Photo of box of 12 gauge shotgun shells at 5604 Flamingo Dr.
190	Photo of loose 12 gauge shotgun shells at 5604 Flamingo Dr. [Gov 226]
191	Photo of Remington 870 shotgun at 5604 Flamingo Dr.
193	Physical Exhibit: Box of 12 gauge shotgun shells at 5604 Flamingo Dr. (Vasquez)
194	Physical Exhibit: three 12 gauge shotgun shells at 5604 Flamingo Dr. (Vasquez)
196	Photo of broken phone piece from dining room (Room 3) at 5604 Flamingo Dr.
197	Photo of broken phone piece from media room (Room 8) at 5604 Flamingo Dr.
198	Physical Evidence: Broken Apple iPhone (put together) (Harding/Withers)
199	Certification under FRE 902(14)
205	Photo of F-150 (at police station)
206	Photo of inside of Ford F-150 passenger side
207	Photo of inside of Ford F-150 driver's side
208	Photo of backpack unzipped
209	Photo of closeup of backpack showing black bag and ziplock bag
210	Photo of Prime bag with black trash bags and other items from backpack
212	Photo of burner phone found in center console of F-150
213	Physical Evidence: Burner phone (7196) (Campbell)
216	Extraction report from burner phone – Relevant text messages with 214-XXX-0434

217	Excerpt from burner phone extraction report – Relevant text messages with 469-XXX-3948
218	Excerpt from burner phone extraction report – Video of Beard and W.B.
	Photo of pieces of boots in black bag #1 (shows entirety of contents of bag)
_ 220	Photo of piece of boot from black bag #1 for scale
221	-
222	Photo of pieces of insole from black bag #1
223	Photo of black bag #2
224	Photo of contents of black bag #2
225	Photo of black bag #3
226	Photo of pieces of boot in black bag #3
227	Photo of tongue of boot from black bag #3 5963.JPG
228	Photo of bottom of black bag #3
229	Photo of black bag #4
230	Photo of pieces of boot in black bag #4
231	Photo of white trash bag containing brown make up vials, screwdriver, and knife
232	Photo of white trash bag containing brown make up vials, screwdriver, and a knife
233	Photo of brown make up vials
235	Physical evidence: brown make up vial #1
236	Physical evidence: brown make up vial #2
238	Google Map screenshot of 5604 Flamingo and Ford Expedition location
239	Photo of VIN from Expedition
240	Photo of front of Expedition on Onset Road
241	Photo of intersection of Onset Bay and Port Isabel
242	Photo of driver's side front of Expedition
243	Photo of driver's side of Expedition
244	Photo of driver's side back of Expedition
245	Photo of passenger side of Expedition

246	Photo of passenger side of Expedition lit up
247	Photo of Expedition of black trash bags in passenger window
248	Photo of passenger side of Expedition showing distinct marking
249	Photo of steering wheel with apparent blood
250	Photo of driver's seat, steering wheel, and beard through window
252	Photo of Expedition at garage
253	Photo of driver side
254	Photo of rear cargo space of Expedition
255	Photo of passenger side
256	Photo of glove box
257	Photo of console showing air freshener tree and key
259	Photo of driver seat with apparent blood
260	Photo of driver floorboard with apparent dark hair
261	Photo of close-up of bloody dark hair on floorboard
262	Close-up of steering wheel with apparent blood
263	Photo of fake beard near seatbelt latch
264	Photo of documents in passenger visor
265	Photo of two license plates (front plate to Expedition and paper plate from
265	Nissan Quest) and title to vehicle Photo of title to Expedition
266	Photo of the back of Expedition title
267	Physical evidence: Documents for Expedition (Campbell)
269	Physical evidence: Expedition fingerprint packet (Campbell)
270	Physical evidence: License plate and title for Quest (found in glovebox of
272	Expedition) (Campbell)
274	Photo of air freshener wrapper with apparent blood
275	Photo of air freshener wrapper with apparent blood
276	Photo area near seat belt without Blue Star

277	Photo of area near seat belt with Blue Star
278	Photo of steering wheel without Blue Star
279	Photo of steering wheel with Blue Star
280	Photo of driver's side mat without Blue Star
281	Photo of driver's side mat with Blue Star
282	Photo of driver door handle without Blue Star
283	Photo of driver door handle with Blue Star
284	Photo of passenger side without Blue Star
285	Photo of passenger floorboard with Blue Star
286	Photo of Ignition/gear shift without Blue Star
287	Photo of Ignition/gear shift with Blue Star
289	Photo of fake beard with evidence bag
290	Close up photo of fake beard
292	Physical evidence: Fake Beard (Campbell) [SWIFS #15]
293	Physical Evidence: Air Freshener (Campbell) [SWIFS #16]
294	Physical Evidence: Hair from driver's floorboard) (Campbell) [SWIFS #18]
295	Physical Evidence: Steering wheel swab (Campbell) [SWIFS #28]
302	Photo of SWIFS # 15.1.1.1 (sample from fake beard [T1]), SWIFS # 15.1.1.2 (sample from fake beard [T2]) & SWIFS # 16.1.1 (Stain from air freshener [T2])
303	Photo of SWIFS # 18.1.1 (Hair from driver's floorboard [T1])
304	Photo of SWIFS # 28.1.1 (Steering wheel swab)
306	Physical Evidence: Buccal swab from Beard (Chevalier) [SWIFS # 8]
311	Photo of Quest at Carrollton PD shows paper plate (matches VIN from paper plate in Expedition)
312	Photo of Quest at Carrollton PD showing front driver's side
313	Photo of rear license paper plate of Quest
314	Photo of VIN of Quest
316	Photo of Quest car title

317	Physical evidence: Quest title document (Vasquez/Powell)
318	Physical Evidence: Documents for Quest
319	Physical evidence: Quest fingerprint packet (Powell)
328	Still shot from Vergara body cam video
340	Sept. 2, 2020 911 call by "Frank Marrow" (Carlisle)
350	S. Wright's texts with Burkett about fake drugs (from Wright's phone)
351	H. Smith's texts with Burkett about fake drugs (Smith's phone)
365	Photo of Camillus knife & sheath (demonstrative)
366	Photo of Camillus knife & sheath—UPC (demonstrative)
367	Photo of Camillus knife & sheath (demonstrative) compared to Camillus sheath recovered at Greentree Apartments (GX 25)
369	Physical Evidence: brown Maybelline makeup & receipt (demonstrative) (Hanson)
370	Photo of brown Maybelline makeup—label shown (demonstrative) compared to brown makeup recovered from Beard's truck
371	Photo of brown Maybelline makeup (demonstrative) compared to brown makeup recovered from Beard's truck
379	JP Morgan Chase Records (Beard); FRE 902
380	Relevant excerpt—ATM withdrawal 9/26/2020
384	Walmart Records; FRE 902
385	Relevant excerpt—9/19/2020 purchase at McKinney store (#5211)

DX	EXHIBIT DESCRIPTION
1	Andrew Charles Beard Arrest Booking Photo
2	Flamingo Search Photo - House
3	Flamingo Search Photo - Dining Room
4	Flamingo Search Photo - Stairs
5	Flamingo Search Photo - Main Bedroom
6	Flamingo Search Photo - Main Closet
7	Flamingo Search Photo - Kitchen

8	Flamingo Search Photo - Kitchen 2
9	Flamingo Search Photo - Kitchen 3
10	Flamingo Search Photo - Kitchen 4
11	Flamingo Search Photo - Garage
12	Flamingo Search Photo - Garage 2
13	Flamingo Search Photo - Garage 3
14	Flamingo Search Photo - Garage 4
15	Flamingo Search Photo - Garage 5
16	Flamingo Search Photo - Garage copy
17	Flamingo Search Photo - Office
18	Flamingo Search Photo - Office 2
19	Flamingo Search Photo - Upstairs Den
20	Flamingo Search Photo - Upstairs Den 2
21	Flamingo Search Photo - Upstairs Den Closet
22	Flamingo Search Photo - Upstairs Bathroom
23	Flamingo Search Photo - Guest Bedroom Clothes Pile
24	Flamingo Search Photo - Backyard to Lake
25	Flamingo Search Photo - Outside Back
26	Flamingo Search Photo - Bowfishing Bows
27	Flamingo Search Photo - Nasr Jewelry Box
28	Flamingo Search Photo - Nasr Jewelry Receipt
29	Flamingo Search Photo - Nasr Jewelry Receipt 2
30	Flamingo Search Photo - Nasr Jewelry Receipt 3
31	Flamingo Search Photo - Nasr Jewelry Receipt 4
32	Flamingo Search Photo - Nightstand Drawer
33	Flamingo Search Photo - Glock Handgun
34	Flamingo Search Photo - Nightstand Drawer 2
35	Flamingo Search Photo - Kimber Solo Handgun

36	Flamingo Search Photo - Bathroom Cabinet
37	Flamingo Search Photo - Beard Apology Note
38	Flamingo Search Photo - Beard Apology Note p.1
39	Flamingo Search Photo - Beard Apology Note p.2
40	Flamingo Search Photo - Beard Apology Note p.3
41	Flamingo Search Photo – Beard's Notes on 9-30-2020 Court Hearing
42	Flamingo Search Photo – Beard's Notes on 09-30-2020 Court Hearing Closeup
43	Flamingo Search Photo - Gun Safe
44	Flamingo Search Photo - Gun Safe 2
45	Flamingo Search Photo - Gun Safe 3
46	Flamingo Search Photo - Gun Safe 4
47	Flamingo Search Photo - Gun Safe 5
48	Flamingo Search Photo - Gun Safe 6
49	Flamingo Search Photo - 12 Gauge Shotgun Shell Box
50	Flamingo Search Photo - 2nd 12 Gauge Shotgun Shell Box
51	Flamingo Search Photo - Top of Gun Safe
52	Flamingo Search Photo - Top of Gun Safe 2
53	Flamingo Search Photo – Beard's Tan Backpack
54	Flamingo Search Photo – Beard's Tan Backpack 2
55	Flamingo Search Photo - Ruger Vaquero Revolver
56	Flamingo Search Photo - Beretta 960 Centurion Handgun
57	Flamingo Search Photo - Colt 90 Series Handgun
58	Flamingo Search Photo - Beretta 92 Parabellum Handgun
59	Flamingo Search Photo - Ruger LCP Handgun
60	Flamingo Search Photo - Ruger 22 Charger Pistol
61	Flamingo Search Photo - Springfield XDm Handgun
62	Flamingo Search Photo - Remington 870 12 Gauge Shotgun
63	Flamingo Search Photo - Savage Arms 7mm Rifle with Scope

64	Flamingo Search Photo - Daniel Defense 556 Rifle
65	Flamingo Search Photo - Marlin 30AS Lever Action Rifle
66	Flamingo Search Photo – Bushmaster 556 Rifle
67	Flamingo Search Photo - Garage Toolbox Drawer
68	Flamingo Search Photo - Hilti Graph Paper Notes
69	Flamingo Search Photo - Hilti Graph Paper Notes 2
70	Flamingo Search Photo - Hilti Graph Paper Notes 3
71	Flamingo Search Photo - Hilti Graph Paper Notes 4
72	Flamingo Search Photo - Hilti Graph Paper Notes 5
73	Flamingo Search Photo - Hilti Graph Paper Notes 6
74	Flamingo Search Photo - Hilti Graph Paper Notes 7
75	Flamingo Search Photo - Hilti Graph Paper Notes 8
76	Flamingo Search Photo - Hilti Graph Paper Notes 9
77	Flamingo Search Photo - Palmetto State Armory 556 Rifle
78	Flamingo Search Photo - Pellet Rifle
79	Flamingo Search Photo - Kiddie Academy App
80	Flamingo Search Photo - Kiddie Academy App 2
81	Flamingo Search Photo - Kiddie Academy App 3
82	Flamingo Search Photo - Kiddie Academy App 4
83	Flamingo Search Photo - Kiddie Academy App 5
84	Flamingo Search Photo - Kiddie Academy App 6
85	Flamingo Search Photo - Kiddie Academy App 7
86	Flamingo Search Photo - Kiddie Academy App 8
87	Flamingo Search Photo - Kiddie Academy App 9
88	Flamingo Search Photo - Kiddie Academy App 10
89	Flamingo Search Photo - Beard's Dec 2019 Alyssa Log
90	Flamingo Search Photo - Beard's Portfolio
91	Flamingo Search Photo - Beard Portfolio Docs

92	Flamingo Search Photo - Beard Portfolio Docs 2
93	Flamingo Search Photo - Beard Portfolio Docs 3
94	Flamingo Search Photo - Beard Portfolio Docs 4
95	Flamingo Search Photo - Beard Portfolio Docs 5
96	Flamingo Search Photo - Beard Portfolio Docs 6
97	Flamingo Search Photo - Beard CA & MT Drivers Licenses
98	Flamingo Search Photo - Beard Portfolio Docs 7
99	Flamingo Search Photo - Beard Portfolio Docs 8
100	Flamingo Search Photo - Beard Portfolio Docs 9
101	Flamingo Search Photo - Beard Portfolio Docs 10
102	Flamingo Search Photo - S&W Airweight Snubnose Revolver
103	Flamingo Search Photo - Warrant & Evidence Log
104	Flamingo Search Photo - Kitchen Exit Photo
105	Flamingo Search Photo - Garage Exit Photo
106	Flamingo Search Photo - Upstairs Den Exit Photo
107	Flamingo Search Photo - Beard's Homemade Silencer
108	Flamingo Search Photo - Beard's Homemade Silencer 2
109	Flamingo Search Photo - Beard's Homemade Silencer 3
110	Flamingo Search Photo - Beard's Homemade Silencer 4
111	Flamingo Search Photo - Beard's Homemade Silencer 5
112	Flamingo Search Photo - Beard's Homemade Silencer 6
113	Flamingo Search Photo - Beard's Homemade Silencer 7
116	Hilti Graph Paper Notes Scan from Flamingo Search
123	Frank Marrow 911 Call
124	Det. Bonner Interview of Nina Bulling (1 of 2)
125	Det. Bonner Interview of Nina Bulling (2 of 2)
132	Beard & Holly Chat – Beard's Work Phone (DX 132A: attachments)
136	Holly & Beard Work Phone Chat - Holly's iPhone

138	Beard & Holly Chat - Beard's iPad (DX 138A: attachments)
140	Photo - Bowfishing gar - Beard's iPad Mini
141	Photo - Bowfishing gar 2 - Beard's iPad Mini
142	Photo - Holly shooting pellet rifle on Flamingo deck - Beard's iPad Mini
143	Photo - Holly shooting pellet rifle 2 - Beard's iPad Mini
144	Photo - Beard bowfishing with dead carp - Beard's iPad Mini
145	Live photo of arrow through two gar - Beard's iPad Mini
146	Live photo of bow hunted beaver - Beard's iPad Mini
147	Live photo of bow hunted beaver 2 - Beard's iPad Mini
163	Holly "Pick Up Your Book" Willow Video
164	Photo of Holly & Willow on Outdoor Couch
165	Photo of Willow, Holly, & Beard - Flamingo Upstairs Den
166	Photo of Willow, Holly, & Beard
172	Walmart Email with Receipt
173	Walmart Receipt
174	Images of Walmart Purchased Items
178	Photo of Nissan Quest #1
179	Photo of Nissan Quest #2
180	Photo of Nissan Quest #3
213	Flamingo Search Photo - Upstairs Den Room 8
214	Flamingo Search Photo - Upstairs Den Room 8 #2
215	Flamingo Search Photo - Upstairs Den Room 8 #3
216	Flamingo Search Photo - Upstairs Den Closet
217	Flamingo Search Photo - Upstairs Den Room 8 Exit
221	Walgreens Records
222	Holly's iPhone - Notes Extraction
223	Holly's iPhone - Contacts Extraction
324	Photo of Prime Tracking tracker from Beard's iPad (taken 10-25-2019)

337	Photo – Golf Cart & Volkswagen Jetta at Flamingo
341	Photo - Search of Beard's Ford F150 1
342	Photo - Search of Beard's Ford F150 2
343	Photo - Ford Expedition-Seller Photo
344	Photo - Ford Expedition-Onset Bay 1
345	Photo - Ford Expedition-Onset Bay 2
346	Photo - Ford Expedition-Onset Bay 3
347	Photo - Ford Expedition-Onset Bay 4
348	Photo - Ford Expedition-Onset Bay 5
349	Photo - Ford Expedition-Onset Bay & Tern Harbor Signs
350	Holly Photo 1 - iPhone Extraction
351	Holly Photo 2 - iCloud Extraction
352	Holly Photo 3 - iCloud Extraction
353	Holly Photo 4 - iCloud Extraction
354	Holly Photo 5 - iCloud Extraction
355	Holly Photo 6 (with Willow & Beard) - iPhone Extraction
363	Photo - GM pre-makeup application
364	Photo - GM post-makeup application
385	Beard - 08-31-2020 Emails - Beard (broken) iPhone SE
390	Walgreens Defense Subpoena Records 1 of 2
391	Walgreens Defense Subpoena Records 2 of 2

Respectfully submitted,

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